

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GENEVIEVE EVANS,

Plaintiff,

v.

GUITAR CENTER STORES, INC.

and.

FILIP TODOROVSKI,

Defendants.

CIVIL ACTION NO. 2:20-cv-05880

DECLARATION OF KRISTIN JARAMILLO

I, KRISTIN JARAMILLO, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true or correct:

1. I am over the age of twenty-one (21) years, of sound mind, and am capable of making this Declaration. I have personal knowledge of the facts set forth in this Declaration, or I have knowledge of such facts based on my review and knowledge of the business records and files of Defendant Guitar Center, Inc. (“Guitar Center”) and could testify to the same if called a witness in this matter.

2. I am the Director of Human Resources for Guitar Center. As a result of my job duties, I am personally familiar with Guitar Center’s business practices and Guitar Center’s policy regarding arbitration. I have also reviewed certain personal records of Plaintiff Genevieve Evans.

3. Guitar Center is headquartered in Westlake Village, California and is the largest chain of music retailers in the United States, with employees across 600 locations.

4. On or about May 13, 2019, Guitar Center hired Ms. Evans as a sales associate at one of its "Music and Arts" stores located in Plymouth Meeting, Pennsylvania.

5. ADP is a provider of human resources management web-based services.

6. Any action an applicant to Guitar Center takes with respect to applying to a position, accepting an offer of employment, agreeing to arbitration, consenting to a background check, or ultimately being hired, is tracked in an "electronic footprint."

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 21st day of April 2022, at 2:58 pm


KRISTIN JARAMILLO